

Page 195

1 response to --

2 A. Yes.

3 Q. Okay. Did you ever, after you went up to 300, go
4 back to anyone and say, hey, I still believe I'm making less
5 than other guys?

6 A. Yes.

7 Q. And who did you go to at that point?

8 A. Once again, the chain of command, sir, instructor,
9 Mr. Hamilton, and so forth.

10 Q. Okay. You spoke to which instructors?

11 A. I talked to Mike Wenner and Dwayne Bruce first.

12 Q. Okay. And they told you to go speak to
13 Mr. Hamilton?

14 A. Yes.

15 Q. And you spoke to Mr. Hamilton?

16 A. Yes, I did.

17 Q. And what did Mr. Hamilton tell you?

18 A. He told me to make a couple phone calls. He
19 inquired about it, see if he can't get me an appointment in
20 with the bookers and figure out can they get it figured out.

21 Q. Did you meet with anybody from the bookers?

22 A. I talked to Terry Taylor about it.

23 Q. And what did Mr. Taylor tell you?

24 A. He pretty much told me don't worry about it,
25 you're making good money, so why were you complaining.

1 Q. Okay. Well, were you satisfied with that answer?

2 A. No, sir, I wasn't.

3 Q. Did you go up -- further up the chain of command?

4 A. Yes, I did.

5 Q. Who did you go to?

6 A. I asked to see Eric Bischoff, and once again, I
7 had at least three meetings that I was supposed to met with
8 him and not one of the meetings I met with him. I only met
9 with somebody underneath him, which once again --

10 Q. Who did you meet with?

11 A. Mr. -- JJ.

12 Q. Okay. And what did Mr. Dillon tell you about your
13 concern about your pay?

14 A. He told me he'd check into it.

15 Q. Okay. Did he ever get back to you?

16 A. No, he didn't.

17 Q. You don't know what he did or didn't do to look
18 into it, do you?

19 A. No, sir, I don't.

20 Q. Okay. Then as far as your complaint that you were
21 paid less under your contract, you told me earlier you don't
22 know what other people with trainee contracts like yours
23 were paid, right?

24 A. Right. You're talking about training contract or
25 everybody in general contract?

Page 197

1 Q. Well, let me -- we talked about the amount you
2 were paid when you made non-contract appearances --

3 A. Yes, sir.

4 Q. -- right?

5 A. Yes, sir.

6 Q. Let me move now to the amount. Do you believe
7 that you were paid a discriminatory amount when you received
8 your contract --

9 A. Yes, sir.

10 Q. -- for WCW? And that's because do you believe
11 other people were paid more than you?

12 A. Yes, sir.

13 Q. Okay. But you don't know who was paid more than
14 you?

15 A. Yes. Well, primary example, I mean, you can use
16 the guy -- what's his name? -- Tank Abbott.

17 Q. Okay.

18 A. Okay. UFC fighter, okay. I won more Tough Man
19 titles than he won UFC. Tough Man is a lot bigger name than
20 UFC. I won -- by the time they brought him on board, I had
21 won 18 Tough Man titles. He only I think at the time maybe
22 won maybe one, maybe two times.

23 They paid the guy \$650,000. They hired him before
24 me, gave him a contract before me, at \$650,000 and only gave
25 me, what, 3200, 3250.

1 Q. Well, the \$650,000 you're claiming was per year,
2 right?

3 A. Correct.

4 Q. And your 3250 was per month, right?

5 A. Correct.

6 Q. Okay. You don't know who made the decision to
7 hire Mr. Abbott, do you?

8 A. No, sir, I don't know.

9 Q. Okay. And are you aware of what Mr. Abbott's
10 national reputation was at the time he was brought under
11 contract with WCW?

12 A. My reputation was as big as his, Tough Man. Tough
13 Man is -- UFC is not on no major network. All right. It's
14 banned in most states. Okay. FX is a subside of Fox.

15 Q. Do you ever watch the television show Friends,
16 Mr. Norris?

17 A. No, sir, I don't.

18 Q. Are you aware of its stature within the world of
19 television?

20 A. Yes, it is.

21 Q. Pretty highly rated show?

22 A. It's in the top ten shows.

23 Q. Do you know if Mr. Abbott ever appeared on
24 Friends?

25 A. I don't know, but I know Tough Man is one of the

Page 199

1 top ten shows on television right now.

2 Q. On cable?

3 A. Yes, it is.

4 Q. Okay. Not on network?

5 A. FX.

6 Q. Okay. But you don't know whether Mr. Abbott
7 appeared on Friends and had the kind of reputation where he
8 would appear on Friends, do you?

9 A. I don't know, sir.

10 MR. ICHTER: Before or after his contract?

11 MR. PONTZ: I just asked him a question.

12 MR. ICHTER: Well, I mean, are you asking him
13 about an appearance on Friends before or after his contract?

14 MR. PONTZ: He stated he wasn't aware of any
15 appearance on Friends, so --

16 MR. ICHTER: Okay.

17 BY MR. PONTZ:

18 Q. But again, it's your opinion that your reputation
19 was more well known than Mr. Abbott; is that what you're
20 telling me?

21 A. Well, like I said, as far as a series, as far as
22 television, as far as ratings, we're talking about ratings.
23 I mean, I'm not knocking the guy. I mean, I'm pretty sure
24 he's trying to feed his family too, but so am I.

25 And my thing of it is, if you've got a guy with 18-

1 titles right here knocking guys out with one single punch,
2 then you've got a guy here in the UFC in 40 different states
3 where it's banned, so who do you think is going to get more
4 coverage?

5 I did a pay-per-view with Tough Man and the
6 ratings was astronomical. I mean, it was good ratings and
7 everything, and I came back and won the Tough Man. But --
8 so I'm trying to figure out how can you justify. The
9 difference is, you've got a white fighter over here and a
10 black fighter over here.

11 Q. Well, you don't know what Mr. Abbott's general
12 popularity or knowledge among fans at large was, do you?

13 A. You're right, I don't know what his general
14 popularity is with fan, but click on the Tough Man board
15 sometimes.

16 Q. You don't know what WCW considered or didn't
17 consider when they decided to give a contract to Mr. Abbott,
18 do you?

19 A. It's not the case of giving him a contract. It's
20 the case of amount. He's a white wrestler with 650,000.
21 You've got a black guy over here with more titles. It's
22 like having Ali over here and Roy Jones over here. Jones is
23 good. So is Ali. That's what I'm saying. It's not fair.
24 But it's a black and white issue once again, sir.

25 Q. I understand, but you don't know what went into

Page 201

1 the decision of why they had to give Mr. Abbott or why they
2 decided to give Mr. Abbott \$650,000?

3 A. Sir, you're right, I don't understand, you know,
4 and I don't know, but let's look at it this way, okay.

5 You've got a black guy here, a white guy here, correct?

6 Okay. You've got a white guy that can't wrestle at all,
7 never been trained, never spent one day at the Power Plant.
8 I know I'm there every day. Not one taping of Mr. Abbott on
9 from the Power Plant. Hardbody on every tape in there from
10 the Power Plant.

11 Q. Mr. Norris, you don't know if someone at WCW
12 thought that Mr. --

13 A. Abbott?

14 Q. -- Abbott would bring in fans, do you?

15 A. It's great bringing in fans, but are they bringing
16 fans? It's a wrestling company. It's a business.

17 Q. But you don't know if someone made the decision
18 that, hey, I believe Tank Abbott will bring in lots and lots
19 of fans?

20 A. Great. You can bring in the man and bring in lots
21 and lots of fans, but once you put a guy in the ring that
22 can't do what Hulk Hogan do for us, bring to the ring, you
23 know, as far as talent-wise, charisma, if he can't do the
24 same, you got nobody.

25 You've got a guy with no shape, no body. I'm not

1 knocking him. I'm just speaking. Over here you've got a
2 guy who chiseled out of stone, done won over 18 titles and
3 knocked guys out on television on a major network and can
4 wrestle.

5 Q. Mr. Norris, I appreciate that. I would like you
6 to try to answer my question, though.

7 A. Okay, sir.

8 Q. Okay. My question is, you don't know why someone
9 made the decision to give that contract to Mr. Abbott, do
10 you?

11 A. The only thing I can say, sir, because he's white
12 and I'm black.

13 Q. That's the only thing you can conclude?

14 A. That would be my answer. White and black,
15 discriminatory once again, sir.

16 Q. But you don't know why someone did or didn't make
17 that decision?

18 A. Racist basis it's got to be.

19 Q. In your opinion?

20 A. Yes, sir. That's my answer.

21 Q. Anything else that we haven't talked about that
22 you believe is part of or goes to your claim that you
23 weren't paid the same as others because of your race, other
24 than what we've already talked about?

25 A. Well, once again, sir, you know, I mean, we

Page 203

1 mentioned earlier, I mean, you're talking about talent, you
2 know. You put all the expectations and say, okay, they want
3 you to do this, this, this, this, and this. I met all the
4 expectations.

5 How come my money wasn't the same as this guy, or
6 why come I couldn't, you know, reach the same plateau as
7 this guy or wasn't afford the opportunity to reach the same
8 plateau. And the only answer, like I say, you might don't
9 want to hear it, is it's racism. Okay.

10 Let's look at it for what it's worth. How many
11 black champions has WCW had before we started this suit?
12 None. As soon as we start this suit, they drop the belts on
13 every black guy they had.

14 Q. Mr. Norris, have you ever heard of a guy named Ron
15 Simmons?

16 A. Yes, I heard of him.

17 Q. Do you know whether he was a championship at WCW?

18 A. Yes, he was a champion.

19 Q. So what you just said then about WCW having no
20 champions before you brought this lawsuit, that's not right,
21 is it?

22 A. Excuse me?

23 Q. You just said WCW had no black champions --

24 A. One guy, he had the belt maybe a week and a half
25 and they took it off him.

1 Q. Do you know that for sure or are you just
2 guessing?

3 A. I'm pretty sure about a week and a half. Pretty
4 close.

5 Q. You think so?

6 A. (Indicated in the affirmative.)

7 Q. That's fine.

8 A. And then after they drop the belt off of him, took
9 the belt off of him, they pretty much fired him.

10 Q. Do you know that?

11 A. Yes, sir.

12 Q. Have you ever spoken to Mr. Simmons about it?

13 A. Yes, I did.

14 Q. And what did he tell you?

15 A. Well, he fired -- you know, he was the one who
16 told me he got fired.

17 Q. Okay. And what did Mr. --

18 A. Got released.

19 Q. Do you know where Mr. Simmons is now?

20 A. No, I don't.

21 Q. Do you know whether he's in the WWF or not?

22 A. Yes, he is in WWF.

23 Q. Okay. Do you know how he got to the WWF?

24 A. No, I do not.

25 Q. Okay.

Page 205

1 A. But I'm pretty sure he didn't get no letter from
2 WCW to go to WWF.

3 Q. Did you try to go to the WWF when you got
4 terminated under your contract?

5 A. No, I did not.

6 Q. Anything else about your pay claim that we haven't
7 already talked about that you believe supports your claim
8 that you were paid less because of your race?

9 A. Well, that's the main thing because, sir, once
10 again, I mean, I know you might not want to hear it. It's
11 like beating a dead horse.

12 But let's look at, you know, look at the top ten
13 white wrestlers, the top -- well, you ain't got a top ten
14 black wrestlers in WCW. Let's say top five. Look at the
15 salaries amount. It's never going to be equal.

16 Then, again, let's flip the ladder the other way.
17 Look at the bottom, you know, white wrestlers and the bottom
18 black wrestlers, and the money is still going to be almost
19 ten to one. They're racial.

20 So either way you look at it, I can't win. My
21 hands are tied up. You throw me in the ocean, and I'm still
22 drowning.

23 Q. Do you remember, Mr. Norris, do you remember a
24 trainee --

25 A. A trainee?

1 Q. Hang on one second. Do you remember a trainee
2 named Brett Yokely from your time at the Power Plant?

3 A. Yes, I do.

4 Q. What did Mr. Yokely look like?

5 A. What did Mr. Yokely look like?

6 Q. Big blond guy?

7 A. I remember what he looked like. I'm trying to
8 describe him.

9 Q. Okay. Go ahead.

10 A. In my own words, I would describe him as from the
11 movie Mad Max. You remember that big guy and the little
12 guy? Well, he's the big guy with none of the little guy's
13 sense.

14 Q. Okay. He is six-six or so, you think that's about
15 right?

16 A. Yeah, he's six-five easy.

17 Q. Coming up on 300 pounds, 275, 300?

18 A. About 275, 280.

19 Q. Well-built guy?

20 A. Well built.

21 Q. You don't know what he was paid under his trainee
22 contract at the Power Plant, do you?

23 A. Excuse me?

24 Q. You don't know what he was paid under his trainee
25 contract --

Page 207

1 A. No, I have no idea.

2 Q. You don't know if he was paid less than you, do
3 you?

4 A. Excuse me, sir?

5 Q. You don't know if he was paid less than you were,
6 do you?

7 A. No, I do not know, sir.

8 Q. Do you remember a trainee named John Hugger?

9 A. Yes, I do.

10 Q. Do you know if Mr. Hugger was paid?

11 A. No, sir, I don't. By the way, he still is on
12 contract when the company expired. Both of them guys was,
13 as far as I know. I still got released, both of them guys,
14 and I trained both of them guys.

15 Q. Okay. You don't know when they were -- you
16 believe they were still with WCW?

17 A. Well, I got released first before any of those
18 guys and I'm willing to bet you on it I'm a better man.

19 Q. You want to bet me, huh?

20 A. Yes, I bet you your tie. I could use a red tie
21 like that. I bet you they both stayed there longer than I
22 did, and I was there longer and I trained them.

23 Q. Okay.

24 A. I'm correct, ain't I?

25 Q. I have no idea. I'm just trying to find out what

1 you know and what you don't, and if you believe that, you're
2 more than entitled to believe that.

3 A. The tapes right there, times and dates on the
4 tapes.

5 Q. Well, we'll take a look at those tapes.

6 Mr. Norris, is there any other evidence, facts
7 that you believe support that your claim that you were
8 discriminated against on the basis of your race in your pay
9 other than the things we've already talked about?

10 A. Sure. I look at, once again, when I look at every
11 guy that came through the training center, and even the guys
12 after the company did away with it and then Vince McMahon
13 signed, guys that I trained, the young blood, which really
14 going to really be a trip when you see some on tape when
15 they couldn't even hold up the arm, let's more talking about
16 lock up when I trained them guys, because of it's great to
17 give instructors' credit for what they have done, but give
18 me the credit for what I have done, too.

19 Q. Okay. Do you know if anybody at WCW thought you
20 weren't a very good trainer?

21 A. Excuse me?

22 Q. Do you know if anyone at WCW thought you were not
23 a very good trainer?

24 A. Evidently they really didn't say because they
25 continued to do their thing and I continued to train guys.

Page 209

1 I never was said, okay, don't train the guy.

2 Q. And you continued to do it even though you weren't
3 getting paid for it?

4 A. Some things you've got to love to do from the
5 heart, sir.

6 Q. And you didn't think this was -- you thought it
7 was unfair that you weren't getting paid for training,
8 right?

9 A. Yes, sir, I knew it was wrong, but I'm not going
10 to come out with another guy because, you know, he's getting
11 a break before me. It's not his fault.

12 Q. So they were paying Mr. Whatley to train?

13 A. Excuse me, sir?

14 Q. They were paying Mr. Whatley to train, right?

15 A. Yes, sir, they was.

16 Q. And they were paying Mr. Bruce and Mr. Wenner to
17 train?

18 A. Yes, sir.

19 Q. Okay. Well, why do you believe it was due to your
20 race then that you weren't paid to train?

21 A. Well, it's not just only due to my race. It's
22 just the fact that there was discriminatory because they
23 felt that, okay, we've got a guy here who knows just as much
24 we know and can train the guy, but why pay him if we're
25 going to get it for free. That's the attitude they had.

1 Why pay him if you can get it for free.

2 Q. Okay. So in other words, you feel like because
3 you were willing to do it without paying you, they just went
4 ahead and let you do it for free?

5 A. No, sir. I wasn't willing to do it without me. I
6 just didn't want to make waves. Once again, I had a family
7 I wanted to take care of, too.

8 Q. Well, you could have stopped providing the
9 training anytime you wanted to, right?

10 A. Excuse me, sir?

11 Q. You could have stopped providing the training
12 anytime you wanted to, right?

13 A. No, not really because, remember, I was told to be
14 there.

15 Q. Right. But no one -- there's a difference between
16 being there and being required to train people while you're
17 there.

18 A. Correct. If I was told to be in the ring or if I
19 was told to be here on such and such date, you've got to
20 remember, WCW is a traveling company. Their Nitros was on
21 Monday night, their Thunders was on Thursdays, and the house
22 shows between Fridays and Sundays.

23 You've got to understand, they didn't have eight
24 different ring crews. They had only two, and when they had
25 the third backup and everything, that took every instructor

Page 211

1 out of that Power Plant. Guess who had to instruct then?

2 Hardbody. I didn't get paid for it.

3 Q. Who told you to instruct?

4 A. The instructors and Mr. Hamilton.

5 Q. And you could have stopped doing that, but you
6 chose to continue doing it?

7 A. Sir, if I stopped doing that as far as instructing
8 and helping the new recruits and the younger guys out, then
9 how are they going to get trained? Who's going to train
10 them?

11 Q. That's a good question, but that's not your
12 problem, is it?

13 A. Excuse me, sir?

14 Q. That's not your problem, is it?

15 A. My problem was trying to get on contract. My
16 problem is trying to get me paid without making waves.

17 Q. Did you ever say to someone, hey, why don't you
18 put me on contract?

19 A. All the time, sir.

20 Q. Other than Mr. Taylor and Mr. Dillon, did you ever
21 talk to anybody else about that?

22 A. Yes, I did.

23 Q. The trainers?

24 A. I talked to the trainers.

25 Q. And Jody Hamilton?

1 A. They didn't have no absolute pull to get me on
2 contract as far as training pay.

3 Q. Right. Other than Mr. Taylor and Mr. Dillon,
4 anybody else that you talked to who you believe did have the
5 power to get you on to contract?

6 A. I talked to, like I said, Mr. Hamilton. I talked
7 to Dwayne Dwayne Bruce. I talked to Mike Wenner. I talked
8 to Mr. Whatley.

9 Q. And those were guys who you believe didn't have
10 the power to get you under contract?

11 A. Well, I didn't know they didn't have the power.
12 Remember, I'm just a trainee. I'm just a student that's
13 supposed to have been graduated and had a certificate and
14 gone on to the next level.

15 My next level was me getting locked in training
16 everybody else who came behind me watching them get
17 contracts before me.

18 Q. Well, you had moved on to the next level because
19 you were wrestling for WCW, right? We went through records
20 that showed, and you agreed with me --

21 A. Yes, sir.

22 Q. -- you were wrestling?

23 A. Yes, sir.

24 Q. And that certainly was the next level, right?

25 A. Well, that's part of the next level.

Page 213

1 Q. Okay. It wasn't as far as you wanted to go, but
2 it was part of the next level?

3 A. No, no, not as far as I wanted to go. Part of any
4 next level is to learn all you can and pass it on to the
5 next generation. That's any level.

6 Remember, I have ten and a half years in military
7 service. That's the way we train. You train not only to
8 fight but win, but that next NCO come up underneath me, he's
9 got to be able to train his squad as well as I train mine.

10 Q. It's your ethic and your belief that people should
11 pass on what they've learned to people who come after them?

12 A. My ethic and belief, yes, sir, it is.

13 Q. And that's admirable, but no one ever -- you
14 didn't see other people from WCW doing that, did you? Other
15 wrestlers passing everything on and spending their time
16 doing that?

17 A. No, because we've got a lot of selfish people in
18 the world.

19 Q. Not illegal to be selfish, is it?

20 A. Excuse me, sir?

21 MR. ICHTER: I object to that.

22 BY MR. PONTZ:

23 Q. It's not illegal to be selfish -- are you aware
24 that it's illegal to be selfish, Mr. Norris?

25 A. No, it is not illegal, sir.

1 Q. All right. We've talked about a number of things
2 having to do with your pay claims, claims that you're
3 discriminated against on the basis of your pay.

4 A. Yes, sir.

5 Q. Is there anything else that you can think of that
6 we haven't talked about yet that supports your claim that
7 you were discriminated against in pay by WCW, or is that
8 everything that you can think of?

9 A. Well, certain shows. I mean, what you've got time
10 as far as matching up evenly matched matches, things of that
11 nature. Because, think about it, if you're doing house
12 shows and you're inviting guys out, I mean, how hard is it,
13 you've got a house show, say, within 40 miles of Atlanta, to
14 get you two or three guys from the training center.

15 I help training them all anyway, so how hard is it
16 to get one or two of them guys that I'm training and see how
17 it is, give him recognition, you know, the guy who actually
18 helped train them and do a match. Whether it was a win that
19 never went on television, at least it was something. It's
20 like giving a dog a bone every now and then instead of
21 kicking him all the time.

22 Q. But that's not a claim that you were discriminated
23 the amount you were paid, that's a claim that you didn't get
24 that opportunity to wrestle, right?

25 A. No, no, not the opportunity. It's the same thing

Page 215

1 as far as the discrimination.

2 Q. I understand. What I'm trying to focus you on for
3 a minute is --

4 A. Yes, sir.

5 Q. -- any claims of discrimination specifically
6 relating to pay that you received at WCW. We talked about
7 what you were paid when you weren't on contract and you told
8 me about that. We talked about what you paid -- were paid
9 when you were under contract.

10 A. Correct.

11 Q. And you told me about that. And what I'm asking
12 you, is there anything else that you believe is specific to
13 your claims that you weren't paid the same as other people
14 because of your race, or have we talked about everything you
15 can think about on that topic?

16 A. Well, it's the same thing. I mean, I went to
17 arenas and stuff. I mean, they didn't like say, well, we're
18 going to reimburse you for your travel or your time, or, you
19 know, you did this. I mean, that's the same -- back to the
20 same, you know, racist discrimination.

21 What I'm saying, when you're wrestling a guy and
22 say okay, then, we want you to go over tonight or we want
23 you to lose tonight. It's the same claim what we were
24 stating earlier.

25 Q. Mr. Norris, are you aware that there were white

1 wrestlers who weren't reimbursed for their expenses, their
2 travel expenses and their meals?

3 A. Yes. Yes, sir.

4 Q. Anything else other than what we've already talked
5 about that you believe supports your claim that you were
6 discriminated against on the basis of your pay?

7 A. Talent-wise, that's about it.

8 Q. What other ways do you believe you were
9 discriminated against on the basis of your pay? I want to
10 make sure that you and I have talked about --

11 A. Yes, sir.

12 Q. -- everything that you believe supports your claim
13 that you were discriminated against on the basis of your
14 pay, and you've told me a number of things.

15 A. Yes, sir.

16 Q. And I'm trying to make sure there's nothing I'm
17 missing.

18 A. Right.

19 Q. If there's any facts or evidence or reasons you
20 believe you were discriminated against on the basis of your
21 pay --

22 A. Just, like I say, just per talent-wise, that's,
23 you know --

24 Q. You believe there were less talented guys who were
25 paid more than you?

Page 217

1 A. Correct.

2 Q. Who were some of those guys?

3 A. Well, I gave you a list of them earlier. You can
4 use that same list.

5 Q. Is it the same list?

6 A. Yeah.

7 Q. Is there anybody you can think of who's not on
8 that list that you gave me earlier?

9 A. I can get a list tomorrow.

10 Q. Well, we need to talk about it now. If there's
11 somebody you remember afterwards, you can certainly tell
12 your lawyer and he can let us know, and we may want to ask
13 you more questions about those folks, but if you can tell me
14 everybody and anybody you can think of now --

15 A. Okay.

16 Q. -- who you believe you were more talented than who
17 received more pay than you.

18 A. Right.

19 Q. Is there anybody besides that group of folks you
20 already mentioned?

21 A. Well, I mean, there's other guys. I mean, I'm
22 sure, pretty sure they had like 150 guys on contract, and
23 like I said, I don't know all them guys' salaries.

24 Q. You think you're more talented than all of them?

25 A. No, no. I didn't say that, sir.

1 Q. Okay.

2 A. I didn't say that.

3 Q. Which one of those guys or ones of those guys do
4 you think you were more talented than?

5 MR. ICHTER: Can you give him a list?

6 MR. PONTZ: I'm asking him who he believes he was
7 more talented than and was paid less than.

8 MR. ICHTER: Well, it sounds like you want a
9 comprehensive answer.

10 MR. PONTZ: Right.

11 MR. ICHTER: Okay. I'll go get him a list.

12 MR. PONTZ: No, Cary. This is my deposition. I'd
13 like to ask Mr. Norris --

14 MR. ICHTER: No, no, no, no, no, no, no. You're
15 asking him to tell you who he was more talented than, who
16 got paid more than him, and I think it's unfair for you to
17 suggest later on that this person wasn't on his list. We've
18 got a list right down the hall. I'll go get it.

19 MR. PONTZ: Mr. Ichter, I've made no such
20 suggestion whatsoever.

21 MR. ICHTER: No, but I'm waiting for --

22 MR. PONTZ: I'm simply asking Mr. Norris --

23 MR. ICHTER: I am talking about your motion papers
24 that are coming down the pike. If you want to ask him that
25 question, why don't we get him a list?

Page 219

1 MR. PONTZ: If you'd like to do that in your
2 questioning, you're more than happy to do that.

3 MR. ICHTER: I'm not asking him any questions.

4 MR. PONTZ: Then that's fine. I'm conducting the
5 deposition. I'm going to ask Mr. Norris the questions.

6 MR. ICHTER: Okay. I just want to make sure that
7 we're not going to hear that argument later on then, because
8 I can go get him a list right now. If that's what you
9 really want is to know who he thinks he was more talented
10 than that got paid more than him, I've got a list right down
11 the hall.

12 BY MR. PONTZ:

13 Q. Mr. Norris.

14 A. Yes, sir.

15 Q. Is there anybody else you can think of as we sit
16 here right now that you believe you were more talented than
17 and got paid less than?

18 A. Well, WCW had at least, sir, 150 to -- 100 to 150
19 wrestlers on contract, guys and girls, et cetera, Nitro
20 girl, once again, you know, things of that, making a lot
21 more money than me.

22 I know I'm more talented than Nitro girls. For
23 crying out loud, they shake their rump and got tons and tons
24 of money more than I did.

25 Q. Who -- what Nitro girls do you believe made more

1 money than you did?

2 A. All of them.

3 Q. You believe that?

4 A. Yes, sir.

5 Q. Okay. Anybody else besides the Nitro girls?

6 A. I would say the referees. I mean, you know, I
7 mean, a lot of people. I mean, I know everybody got jobs to
8 do and I know everybody go with longevity, but my only thing
9 is, just like when I came to WCW, I came in good faith that
10 good things were going to happen for me. Everything they
11 asked me to do, I had done, which is the American dream.
12 Okay.

13 And in return, you know, I got kicked. And I'm
14 not whining about the kick. I just want to know why. And I
15 would definitely want to keep it happening from the next
16 guy, you know, from getting kicked as bad as I got kicked,
17 because I devoted my time and my effort.

18 Even when I was getting kicked, I still, as you
19 see that box over there, there's a big box. I helped tons
20 and tons of guys to get to where they're at right now.

21 Q. Mr. Norris, you say you want to make sure this
22 doesn't happen to anybody else, right?

23 A. Well, you get taken advantage of.

24 Q. Okay. You know WCW is not operating anymore,
25 right?

Page 221

1 A. Yes, sir.

2 Q. So obviously if what you say is true, it's not
3 going to happen to anybody else in WCW because it's not
4 operating anymore, right?

5 A. Well, it's my work and body name to bring it back,
6 sir. You know how that goes. The company go under and they
7 come back, we change the name and it would be the same, you
8 know, guys in charge running it. It would be the same thing
9 all over again.

10 Q. So that's why you think you're doing this?

11 A. No, sir. I'm doing this because this is the right
12 thing to do. I mean, I was brutalized, discriminated
13 against, and my talents say otherwise.

14 And like I say, I mean, when WCW say, well, Mr.
15 Norris, Hardbody, you ain't good enough, the day that I got
16 released when my wife called me, I still was at the training
17 school. I still trained three people in the ring. I didn't
18 walk away from the ring. I didn't even tell them I got
19 released. I trained them. I didn't want to bring them
20 down.

21 And after that day, no problem. I talked to the
22 office and, you know, told him thank you for what they have
23 done. They need me, they know how to reach me, and I went
24 on with my life.

25 And the next day, like I said, I got in touch with

1 Tough Man. I turned it up two or three notches when I won a
2 couple more titles and went on, did more boxing shows and
3 wrestling shows, because I still had to supplement my income
4 to take care of and feed my family.

5 Q. Other than the things we've talked about already,
6 we've obviously talked about a lot, but is there anything
7 else you think specifically supports your claims that you
8 were paid less because of your race other than things we've
9 talked about?

10 A. My race?

11 Q. You think we've talked about them all?

12 A. Yes, sir, I think so, sir.

13 Q. Okay. Now, you have a claim in your complaint
14 that says you were subjected to a racially hostile work
15 environment. Are you aware of that?

16 A. Yes, I am, sir.

17 Q. Okay. What do you believe about your environment
18 at WCW was racially hostile?

19 A. Well, once again, you know, the guys that served
20 that's been there for a while, you know, they, you know,
21 they made comments and stuff. I tried to overlook a lot of
22 stuff.

23 Q. What kind of comments?

24 A. Well, you know, like, you know, derogatory things
25 like, you know, like with the pimp idea and so forth, and

Page 223

1 the guys say, he already did that. You know, all the white
2 guys, sure, I'll do that, but you're a white guy.

3 You've got to look at me, too. I mean, you want
4 me to go out there and act like something on television, and
5 you want all the blacks to look at me like, man, this guy's
6 an idiot. I still have to live with myself tomorrow
7 morning. I still got to look myself in the mirror. Still
8 kids got to look up to me, you know.

9 And so for a guy that we want to kind of etch that
10 on, you know, that's not the type of environment. Say,
11 well, okay, then, that's the only way you're going to get in
12 to do this, then it's not fair to me. Once again, I'm being
13 discriminated against. It's like, well, if you don't do
14 this, then we won't do this for you. It's like being a
15 carrot dangled over my head. It's not fair to me.

16 Q. Okay. Other than the incident you talked about
17 with Jimmy Hart and the idea of coming out as a character as
18 a pimp, and you just testified about people saying things to
19 you about I would have done it or that kind of thing, are
20 there other things that you believe were said to you that
21 you found racially derogatory?

22 A. Well, you know, sometime we might be doing
23 training and we might be working out, like for a trial. And
24 guys might really be giving their all and can't make it.

25 I mean, you know, I mean, sometimes we call guys

1 names and stuff like that, but it's a limit. You know what
2 I'm saying? It's a limit what you can say to a guy without
3 pushing him over the edge or that kind of stuff.

4 And sometimes they think some of the white guys
5 when we was down there, they really went out of their way on
6 some of the new recruits to do that, just to, I don't know,
7 to get them to quit or go home or whatever and everything.

8 I mean, even squatted the guy to death. The guy
9 can't do not one more squat, and you can call him everything
10 from sad, you know, this to that, to that --

11 Q. Mr. Norris, I appreciate that. I need you to tell
12 me, though, what things you believe were said to you that
13 you found racially discriminatory, very specifically. If
14 you believe that something was specifically said to you, go
15 ahead and tell me about that. You may have been getting
16 there.

17 MR. ICHTER: Just said to him?

18 MR. PONTZ: Excuse me?

19 MR. ICHTER: Just said to him?

20 BY MR. PONTZ:

21 Q. Let's start with things that were said to you that
22 you believe were derogatory and racially discriminatory.

23 A. Well, it's like I thought was derogatory like when
24 Terry Taylor came to me with the issues with Diana Myers,
25 you know.

Page 225

1 First of all, I didn't like the way Diana Myers is
2 on the telephone yelling. I didn't know who she was. I'm
3 getting fresh out of the ring and I'm listening on the phone
4 like this, and I'm trying to get her to calm down so I can
5 say what's going on, first of all.

6 Q. Okay.

7 A. To me, she really don't know me. I never met her
8 before, and for us to meet like that over the telephone, to
9 me, that's discriminatory against me because I'm at a place
10 in environment, in the training environment.

11 There's a right way and wrong way to do things.
12 And just like I told Mr. Hamilton, I said, if that would
13 have been the issue, then what should happen was they should
14 have Mr. Hamilton or somebody brung me up to the office and
15 we sit down and figure out what was going on.

16 That didn't happen. She's screaming and yelling
17 at me through the telephone, you're doing this -- because of
18 what she heard or what she think was going on. Ask me.

19 Q. Is there anything else that you heard that you
20 believe was said to you that was racially discriminatory or
21 derogatory?

22 A. Well, you know, Terry Taylor, a lot of times he
23 would say things. I mean, a lot of times he stay stuff
24 under his breath, or like one incident -- I'm trying to
25 remember. I don't know how he got into it, like with

1 Jacqueline. You remember Jacqueline? There was something
2 said about her about her ring and this and that and all. He
3 made a couple comments about all black females' behinds or
4 something like that. I thought that was like --

5 Q. Do you remember what he said?

6 A. I can't remember exact word, but I just remember,
7 you know, he said some stuff, you know, like that and stuff
8 like that. And then I tell people, I said, that's kind of
9 offensive. You know, you're really on that thin line of,
10 you know, of really hurting people feelings when you say
11 stuff like that.

12 Q. Did you tell Mr. Taylor you --

13 A. Yes, I did.

14 Q. -- found that offensive?

15 A. Yes, I did.

16 Q. What did he say?

17 A. Well, you know, he just turned his nose up like it
18 didn't happen.

19 Q. Did you tell anybody else that Mr. Taylor said
20 that?

21 A. Well, you know, I had talked to the instructors
22 about it, you know, but once again, they're under him so
23 what can they do?

24 Q. Did you tell anybody else besides the instructors
25 about it?

Page 227

1 A. Well, if they take me through the chain of
2 command, so like I say, push up the issue, but not long too
3 much after that she didn't stay around long. She just left.

4 Q. Okay. Any other incidents where something was
5 said to you that you believed was racially discriminatory or
6 derogatory?

7 A. Well, you know, I mean, not directly to me, but
8 people come back and say, well, you know, this guy don't
9 like you because who you are, you're black, you're this or
10 that. I didn't have no proof.

11 Q. Who told you that, Mr. Norris?

12 A. Some of the trainees.

13 Q. What trainees?

14 A. Like Luther Biggs.

15 Q. What did Luther Biggs tell you?

16 A. Well, he told me like, well, this guy --

17 Q. What guy?

18 A. Terry Taylor. We're talking about Terry Taylor
19 again.

20 Q. Okay. So you believe Mr. Biggs told you that
21 Terry Taylor didn't like you?

22 A. Yes.

23 Q. And what did Mr. Biggs say about that?

24 A. Well, he just told me, he said, well, you know,
25 Hardbody, you know, they should be doing something with you,

1 but evidently, you know, you know, you know, he tell me
2 like, well, this guy really don't like you, Terry Taylor.
3 That's why I don't know why. I never did anything to him.
4 I'm just here to do like anybody else, help the company.

5 Q. That's what Mr. Biggs told you?

6 A. Uh-huh.

7 Q. Did he tell you anything else?

8 A. Well, that I should have left a long time ago and
9 went WWF. Stuff like that, sir. That's about it.

10 Q. Anybody besides Mr. Biggs tell you something that
11 you believe had to do with your race or racial
12 discrimination?

13 A. Not really, sir. And the reason why is because,
14 you've got to understand, these guys are looking out for
15 their own career and their own necks, and I mean, you know,
16 it's like you set your own bed on fire and then lay in it.
17 It's not going to happen.

18 Q. Okay. So other than the things we've talked
19 about, was there anything else that was either said to you
20 or you heard or you witnessed around the Power Plant or any
21 of your other experiences with WCW that you believe was
22 racially derogatory or discriminatory?

23 A. Well, as far as racial discriminatory, like I
24 said, the whole cleanup procedure thing. I mean, to me,
25 that was discriminatory because when they got ready to do

Page 229

1 the work and push the brooms, and you look around and
2 everything, I'm seeing the white guys have skated out.

3 Q. Some of the white guys didn't participate?

4 A. Some? The same guy who was getting the money
5 didn't want to do it. And once you give them the money,
6 man, their head really just ballooned up and they really
7 wasn't around then. Some of them took two-hour lunches.

8 Q. Okay. But there were some white guys who hadn't
9 gotten contracts yet who helped?

10 A. The newbies, yeah, because they didn't know the
11 ropes yet, but as soon as they learn the ropes, man, like
12 the old guys teach the new guys the ropes, and man, they was
13 out of there, too.

14 Q. Other than things we've already talked about, is
15 there anything else you can think of that you witnessed, you
16 heard, said to you or said that you heard, someone told you
17 about that you believe was racially derogatory or
18 discriminatory?

19 A. Well, there came a time one time, you know, and I
20 felt really wrong was Doug Dillinger. They had an event,
21 and I had some friends wanting to go to the event, and I
22 tried to get ticket for it.

23 Well, he told me, well, he didn't have no tickets
24 or he couldn't get none, or this and that. I was, okay,
25 fine, no problem. Come turn around, or I don't know where

1 the name, female came up, asked him for a ticket, he gave
2 her like six tickets. Same thing all over again.
3 Discrimination.

4 Q. Okay. Any other instance you can think of that
5 you believe was derogatory or racially discriminatory other
6 than all the things you've already talked about?

7 A. Not that I can recall right now, sir.

8 Q. Okay. Anything you can think of that would help
9 refresh your recollection of incidents of -- that you
10 believe were discriminatory or derogatory?

11 A. Like I said, I can review them tapes, but that's
12 going to take --

13 Q. Okay. Other than what's on those tapes?

14 A. Like I said, I can call up certain guys and, I
15 mean, everybody had different incidents and so forth.

16 Q. Okay.

17 A. But the average guy ain't going to walk up to me
18 and call me the "N" word because they're looking at me that
19 way, this guy can really, you know, break my face here.

20 Q. Did you ever hear the "N" word at the Power Plant?

21 A. Well, some guy pushed it around, but, you know --

22 Q. Who did that?

23 A. Well, some of the local trainees pushed it around
24 and every now and then Mr. Whatley might have got on
25 somebody about doing it. Pez Whatley, he was one of the

Page 231

1. black instructors down there.

2. Q. He'd use the word or he --

3. A. No, no, he would get on -- if he found that
4. somebody did, he would get on them for doing it and pull
5. them aside, chew them out, that kind of stuff.

6. Q. Tell him to stop it?

7. A. Yeah.

8. Q. Was it your experience that usually stopped it?

9. A. Yes, it did, with the trainees. Now, Buff, his
10. level, like I said, it's a whole different another monster.

11. Q. Did you ever hear anybody above his level use that
12. word?

13. A. I heard about a lot of guys using it and throwing
14. it around, but like I said, a lot of times just I wasn't
15. there in those spots.

16. Q. You never heard it yourself?

17. A. I didn't hear nobody call me one, no.

18. Q. Did you ever hear anybody call anybody else one?

19. A. I heard Mr. Dillinger call Rocky King one before.

20. Q. Okay. Tell me about that incident.

21. A. I really don't know. All I know is the "N" word
22. got exchanged and things got heated up between Doug and
23. Rocky and --

24. Q. You heard about this incident or were you there at
25. the time?

1 A. Well, I was there, but like I say, I wasn't right
2 there in the open. I kind of like -- when stuff like that
3 happened, I just kind of go away from it because I don't
4 want to get caught up in the middle of it. I mean, to me,
5 I'm bigger than that, and I ain't the type of guy that sit
6 there and egged on a fight. I figure I'm going to fight,
7 I'm going to get in the ring and fight for money. I'm not
8 going to do the rest of the side show stuff.

9 Q. So you didn't hear exactly what went on between
10 Mr. Dillinger and Mr. King?

11 A. Well, the only thing I heard that Mr. King was
12 being really loud and saying that he said this. I mean,
13 they were going, you know, like that. Well, he called me
14 this and this, and he really was ready to go put the blows
15 to this guy, and they were trying to get him calmed down,
16 this and that and --

17 Q. And you left the area because you didn't want any
18 part of that mess?

19 A. No, I didn't want no part of it.

20 Q. Who did you hear was using the "N" word? Who did
21 people tell you was using the "N" word?

22 A. Well, it's not a rumor, it's for a fact. And like
23 I said, depended on who was around, Terry Taylor, you know,
24 I think he was, you know, one of the thing. I think Mr. Pez
25 had some altercation with Mr. Flair before with the "N"

Page 233

1 word.

2 Q. I mean, I don't want to cut you off. I'll let you
3 get back to that, but let me -- who told you that they
4 believed Terry Taylor was using the "N" word?

5 A. Excuse me?

6 Q. Who told you that Terry Taylor was --

7 A. Pez Whatley.

8 Q. Okay. Anybody else besides Mr. Whatley tell you
9 that Terry Taylor used the "N" word?

10 A. Well, some of the, like I said, the other guys,
11 you know, would come back and say, wait, this guy right here
12 using the "N" word. You need to go, you know, make sure you
13 talk to him and get him settled down.

14 Q. You mean some of the other trainees or --

15 A. No, no, no, no, not the trainee. I'm just talking
16 about that's when they would come to Mr. Whatley.

17 Q. Oh, so they'd come to Mr. Whatley upset?

18 A. Yeah. Well, he's the instructor. He's kind of
19 like a mediator between the two, so forth.

20 Q. Okay. And then you mentioned Mr. Whatley and Mr.
21 Flair.

22 A. Well, you know, I heard before they had some
23 altercation between the "N" words and stuff like that.

24 Q. Do you know when that supposedly occurred?

25 A. No, sir. That's way before my time, sir.

1 Q. Anybody else that you heard was using the "N"
2 word?

3 A. Not so much the "N" word. I heard Ms. -- the
4 thing went around real strong for a couple weeks that
5 Miss Myers uses "geek", "gook" towards some of the Asian
6 wrestlers, Sonny Onoo and towards some of the Japanese
7 wrestlers.

8 Q. Who told you that?

9 A. Excuse me?

10 Q. Who told you that?

11 A. Who told me that? It was all over the Power
12 Plant.

13 Q. Where -- do you remember anybody in particular
14 hearing that from anybody?

15 A. Where I heard it from Sonny himself.

16 Q. Mr. Onoo told you that?

17 A. Yes, he did.

18 Q. You don't know whether that happened; that's just
19 what people told you?

20 A. Well, I heard it from Mr. Onoo, and then I talked
21 to another guy, pretty much kind of mentioned it. I'm
22 trying to think of his wrestling name. I think his name's
23 Saturn, you know.

24 Q. Okay. Any other incident or time that you heard
25 about racially derogatory terms being used at WCW?

Page 235

1 A. Well, you know, guys sit around, I call them old
2 wives' tales, some of the older, you know, white guys sit
3 around and tell how it used to be.

4 Q. Back before you got there?

5 A. Back before I got there, but like I said, I wasn't
6 involved in that and I really don't get caught up in that
7 because to me, that's -- it's not the fact that it's
8 hearsay. It's not none of my business, nor it's not
9 happening now because, you know, it's not right and it is
10 offensive.

11 We're all trying to do two things, make a living
12 and feed our families. So the only thing happening now, so
13 a lot of it they camouflage it really well, and probably
14 which is good because it really could stir up a lot of
15 racial tension within the company.

16 Q. So can you think of any other times when you heard
17 about racially derogatory language or anything like that
18 either being used or supposedly being used while you were at
19 WCW other than what we've already talked about?

20 A. That's about it as far as I can remember, sir.

21 Q. Okay. Great. You were never directed by anyone
22 to wear something you would consider stereotypical ethnic
23 clothing, were you?

24 A. Just with the pimp thing. That's about it.

25 Q. Other than that incident?

1 A. No, sir, that's it.

2 Q. And you don't think your character Hardbody
3 personified racial or ethnic slurs, do you?

4 A. No, sir.

5 Q. It was the opposite, right? You thought it was a
6 positive image?

7 A. Yes, sir.

8 Q. And I think other than what you said, did you
9 complain to anybody else at WCW other than the folks you
10 talked about about any incident of racially derogatory
11 language or racially derogatory conduct or anything like
12 that?

13 A. Well, the main thing, sir, what I did was I
14 informed the instructor, which is our first level chain of
15 command, and which is the head -- over that was Mr.
16 Hamilton, and it was his job to make sure that if we had to
17 go see somebody, they don't want us in the office running
18 around. His job to notify the next for us to get in and get
19 an appointment and so forth.

20 If something didn't happen really soon, then I'd
21 check back with at the time was his secretary, which was
22 Miss Brenda Wood. Brenda Smith is her name.

23 Q. Okay. And what would you check in with Miss Smith
24 for?

25 A. I'd say, well, you know, such and such happened on

Page 237

1 such and such day. Did we hear a comment back about when I
2 got an appointment or things of that nature.

3 Q. And she helped you facilitate getting to talk to
4 somebody if you needed to talk to somebody else?

5 A. She helped me -- she make sure that Jody got the
6 appointments for whoever we need to go see to talk to them
7 about contract or the incidents or things of that nature.

8 Q. Anything else you can think of that we haven't
9 already talked about that deals with derogatory comments or
10 racially derogatory comments or actions or things like that
11 other than all the things we've already talked about?

12 A. No, sir, not that I can remember.

13 Q. Mr. Norris, you've got a claim in your complaint
14 for what's called intentional infliction of emotional
15 distress. Now, your lawyer can tell if he disagrees with
16 it, but my understanding of what your claim is is that you
17 believe WCW took intentional actions to emotionally harm
18 you, to cause harm to you emotionally. Not physically but
19 emotionally. Is that your understanding of that claim?

20 A. Yes, sir.

21 Q. Okay. Are you basing that claim on all the things
22 we've already talked about, all the discrimination that you
23 believe happened to you at WCW and the opportunities that
24 you didn't get and the contracts that you didn't get? Is
25 that what you're basing that claim on?

1 A. Well, those things, sir, and well, like I say,
2 once again, my family. You know, you just don't know how
3 hard it is to go home and tell a wife every night, well,
4 it's not going to happen yet, it's not going to happen.

5 So they're waiting for things to happen. They put
6 their life on hold. They move away. You pull your kids out
7 of school. You relocate. I mean, just, you know, they lose
8 their friends and everything, communication, and they're
9 trying to still commute back and forth to their friends long
10 distance and, you know, the bill get outrageous if you ain't
11 making money to take care of it.

12 So, I mean, it is that type of deal. She's
13 shifting new jobs, and I mean, just, really, just it was
14 really stressful time for me. It really was.

15 Q. Okay. Anything other than that stress and all the
16 allegations of discrimination that we've already talked
17 about that go to that claim of intentional infliction of
18 emotional distress, or is it all based on all the things
19 that happened to you at WCW we've already talked about?

20 A. Yeah, based on all the things at WCW and just not,
21 like I said, not with my family thing. You've got to look
22 at also, too, I mean, when things like that happen, it puts
23 you in really in a financial rut.

24 And like I said, I mean, because, once again, once
25 you relocated, things happen, you know. You're putting the

Page 239

1. mileage on your car, back and forth, things tear up.

2. And like I said behind that, I lost my sponsor and
3. everything. Everybody just got tired of waiting. The only
4. person that didn't get tired of waiting was me. I was the
5. same little puppy going down the same trail every day.

6. Q. Is there any other actions other than the things
7. we've talked about that you believe WCW did that were done
8. to intentionally inflict emotional distress on you, as you
9. understand that?

10. A. Yes, sir, I understand that. It's just the fact
11. that I felt out of their discrimination and, you know, and
12. their bias opinion, I felt they did it deliberately because,
13. first of all, they didn't know me or they didn't get a
14. chance to get to know me, which I think we could have did
15. wonderful things for the company together, working together,
16. but that really never had the growth spurt to take off, sir,
17. and the reason why it didn't, they never gave me the
18. opportunity to.

19. Q. Okay. Anything else besides that do you think
20. goes to that claim?

21. A. No, sir.

22. Q. Now, you also have some claims in your complaint
23. for what you claim is failing to be paid a minimum wage and
24. failing to be paid overtime.

25. A. Yes, sir.

1 Q. Okay. What work is it that you believe you
2 weren't paid for that you should have been paid for?

3 A. Sir, I was there longer than anybody else other
4 than Tony Carr, and my thing of it was, I don't mind, like I
5 say, I don't know mind cleaning up. When you mess up, you
6 should clean up. But a lot of times I wasn't the one who
7 mess up.

8 I know how to keep a clean house. Military
9 background taught me that, but I was the one that helped
10 clean up. I wasn't the one to mess up. So the overtime I'm
11 talking about is, like I say, I was the first one there and
12 the last one to go home. And all the footage over there is
13 going to show you that.

14 Q. And usually there, you said, around 9:00 o'clock?

15 A. Yes, sir.

16 Q. And usually gone before 5:00 o'clock?

17 A. Usually go home between 4:30, 5:00. It depended
18 on how long the day. If the day went longer, then I stayed
19 longer.

20 Q. Okay. And how often did you stay longer than
21 5:00, do you believe?

22 A. Oh, a lot of times, because they had a
23 pay-per-view and they had special matches, a lot of times
24 they would keep a couple guys from the school there to what
25 you call tape bumps, do extra matches and that kind of

Page 241

1 stuff.

2 Q. How often did that occur?

3 A. At least three times a week, at least.

4 Q. Every week?

5 A. Yes, sir.

6 Q. Okay. So what time do you really think on average
7 you left the Power Plant then?

8 A. I'd say between 6:30 and 6:55, sir.

9 Q. Okay. And a lot of the time during a normal day
10 you were training and working out and wrestling, right?

11 A. Yes, sir.

12 Q. Okay. And some of the time you said you were
13 helping with rings and things like that?

14 A. Yes, sir.

15 Q. And some of the time you were helping cleaning up
16 and things like that?

17 A. Well, all this was combined, sir. It's not one
18 day we clean up and one day we --

19 Q. I understand. Each day you did different -- all
20 those different things on most days, right?

21 A. Yes, sir.

22 Q. Do you believe you're entitled to pay for all of
23 that work?

24 A. Yes, sir.

25 Q. Why do you believe that?

1 A. Because --

2 MR. ICHTER: Well, first of all, let me object.
3 Whether he believes it or not, the law is what the law is,
4 and the law is going to decide whether or not he's entitled
5 to be paid, so --

6 MR. PONTZ: That's fine, but I'm entitled to ask
7 him why he believes he's entitled to that pay.

8 MR. ICHTER: Sure. Go ahead.

9 THE WITNESS: Well, first of all, like I say, I
10 was told to me the school is going to be this price. I paid
11 them their price. I was told that school was going to be
12 six months.

13 After six months, ain't like somebody brung us all
14 in and counseled us, say, well, okay, then you're good,
15 you're going to stay, you're going to go.

16 I was totally accepted in that school as a member
17 of WCW wrestling, and so on that notion I felt anything else
18 from that point on after that, you know, that six months,
19 okay, then, you're no longer a trainee. Then we need to put
20 you either on a salary or a contract and do one of two
21 things, which is either pay you or let you go.

22 We never was told that. The only thing we was
23 told, you need to be here tomorrow, you'd better be here
24 tomorrow, you're going to clean this up, you're going to do
25 this, you're going to help with the ring. Sir, we wasn't

Page 243

1 given the option, well, you don't have to do this.

2 BY MR. PONTZ:

3 Q. I understand. Did you ever ask to be paid for the
4 days you were spending at the Power Plant?

5 A. Yes, we did, sir.

6 Q. Who did you ask?

7 A. Once again, I went through my chain of command.
8 Every instructor, went through Jody, went all the way up to
9 Terry Taylor and, I mean --

10 Q. And what did they tell you?

11 A. It was like a joke. I mean, after you say it so
12 many time, then it become like, I mean, it got to the point,
13 sir, in the -- really sad to say was sometimes, you know,
14 when Jody told me to get on the phone, call Terry Taylor, to
15 the point I just physically I know he was dodging me.
16 That's how much I called.

17 Q. When did you first ask in your recollection to be
18 paid for the time you were spending at the Power Plant?

19 A. It's that first week after my six months'
20 training.

21 Q. So you believe sometime in August or September of
22 1996?

23 A. Yes, sir. Yes, sir.

24 Q. Is that right? And I take it on a regular day is
25 it fair to say you spent an hour or two on things like ring

1 work and cleanup work, and you spent the rest of the day on
2 wrestling activities, training, learning about wrestling,
3 teaching about wrestling, things like that? Is that a fair
4 breakdown of your day on a normal day?

5 A. I would say between 30 minutes to an hour, all
6 depending on what had to get done.

7 Q. Thirty minutes to an hour on the other stuff and
8 then the rest of the day was spent on wrestling type
9 activities?

10 A. Yes, sir.

11 Q. Okay. And you, until at least '97 or so, were
12 still paying off the amount of money you agreed to pay to
13 train at WCW, right?

14 A. Yes, sir.

15 Q. And when you wrestled, WCW told you the outcome
16 that they wanted for the match, right?

17 A. Yes, sir.

18 Q. And they told you basically that's the story line
19 that we're trying to carry out here, right? So-and-so is
20 going to win and so-and-so is going to lose and maybe this
21 is how we want it to end or a couple key points in the
22 match, right?

23 A. Actually, sir, what the bookers told us is to
24 finish.

25 Q. Okay.

Page 245

1 A. It's up to the guy who you're wrestling or how
2 much of the match he's going to give you. If the booker
3 say, okay, then, I want you to go over strong, then you went
4 over strong. That means you ain't going to get no more than
5 ten, 15 percent of the match.

6 Q. Okay. And you'd sit down or talk to the other
7 wrestler before the match and figure out how you were going
8 to make the match go so it met the criteria that had been
9 set for how the match needs to turn out?

10 A. Actually, you listen to the other guy. Really,
11 there's no talking. You shut up and do what he tells you.

12 Q. So the other wrestler would say here's how it's
13 going to go?

14 A. Yes, sir.

15 Q. Okay. And if you had any concerns or thoughts or
16 specific ideas, you could have offered them and sometimes
17 you chose not to?

18 A. Well, you could offer them, but if he don't want
19 to do it, then he's shooting straight back to the booker or,
20 hey, this guy don't want to listen. He's a hard head. So
21 it's best to listen and go along with the flow and not make
22 waves.

23 Q. And that was coming from the other wrestler that
24 you were wrestling?

25 A. Yes, sir.

1 Q. And as a wrestler, obviously some of your success
2 would have to do with the character that you create, right?

3 A. Yes, sir.

4 Q. And the talent that you bring to the ring?

5 A. Yes, sir.

6 Q. And the invention or imagination or uniqueness of
7 some of the things you do, right?

8 A. Yes, sir.

9 Q. And you paid for your own wrestling equipment?

10 A. Yes, sir.

11 Q. And I think you said in your complaint that
12 sometimes it cost you more to go wrestle to travel and pay
13 for your expenses than you believe you were paid for the
14 wrestling match, right?

15 A. Yes, sir.

16 Q. And you understood that was a risk when you agreed
17 to go wrestle sometimes, right?

18 A. Yes, sir.

19 Q. And you never signed anything that promised you
20 wouldn't wrestle with other companies until you got your
21 contract with WCW, right?

22 A. Correct, sir.

23 Q. And in fact, you worked with SCWA to try to
24 develop wrestling promotions?

25 A. Yes, sir.

Page 247

1 Q. Did you wrestle with SCWA?

2 A. Yes, I did, sir.

3 Q. And until you got your contract, you were paid per
4 the time that you wrestled, right?

5 A. Are you talking from WCW, sir?

6 Q. Yeah.

7 A. Yes, sir.

8 Q. When you went to a wrestling match and appeared,
9 you got paid?

10 A. Two weeks later, you know, that's the way they did
11 it. I mean, come in --

12 Q. You got a check?

13 A. Yes, sir.

14 Q. And if you didn't wrestle in a match, you didn't
15 get paid?

16 A. Yes, sir.

17 Q. So your pay and overtime claims, as you understand
18 them, are based on the time that you spent at the Power
19 Plant before you got your contract; is that what you're
20 believing they're based on?

21 A. Yes, sir. Before I got on contract, all the
22 things I did at the Power Plant as far as helping train
23 other guys, all the cleanup detail and be there on a -- I
24 mean, I was there, like I said, 9:00 to 5:00 or longer.

25 Q. And once you got the contract and were getting

1 paid, then you think those claims stopped; is that your
2 understanding of it?

3 A. No, that's not my --

4 MR. ICHTER: Let me object to the extent that that
5 calls for a legal conclusion. But you can answer.

6 BY MR. PONTZ:

7 Q. That's fine. But go ahead. What's your
8 understanding of --

9 A. My understanding it's not a fact. WCW was paying
10 me to wrestle, to be an independent contractor. Not to
11 break down rings, not to lower rings and so forth. That
12 should be totally separate.

13 I don't mind doing it. I'm not lazy. I don't
14 mind doing it, but it should have been totally separate from
15 everything else.

16 Q. So you believe you should have gotten additional
17 money anytime you helped out?

18 A. Correct.

19 Q. Okay. How -- was it the same kind of time frame
20 that you spent a half hour to an hour or so each day on
21 those other activities?

22 A. Yes.

23 Q. After you were under contract?

24 A. Yes. I mean, every day what we did when we get
25 in, we stretched out. Once they move from the old location

Page 249

1 to the new location, the place was immaculate, you know.

2 Like I said, I think we got some paperwork
3 actually where I submitted ideas for a new training center
4 ideas, that got put in effect, but once again, I feel that
5 it took advantage of my ideas without, once again,
6 compensating me for it.

7 Q. Who did you submit that idea to?

8 A. Terry Taylor, JJ Dillon.

9 Q. When did you do that?

10 A. It should be the date on there, sir.

11 Q. You believe it was sometime in 1997?

12 A. Well, the date on it, I'm not sure on the date,
13 sir.

14 Q. And that's the document your lawyer produced to me
15 earlier today?

16 A. Yes, sir.

17 Q. Okay.

18 VIDEOGRAPHER: Sorry to interrupt. I need to
19 change the tape.

20 (Whereupon, a brief recess was taken.)

21 BY MR. PONTZ:

22 Q. Mr. Norris, before we took a break we were talking
23 about a document that your lawyer provided to me about an
24 idea you had for the training session and training programs
25 at WCW. Remember that?

1 A. Yes, sir.

2 Q. Okay. And you said you gave that document to JJ
3 Dillon and Terry Taylor?

4 A. Yes, sir.

5 Q. Do you know what if anything they did with that
6 document?

7 A. Actually, sir, I really don't know what they did
8 with the document. The only thing I do know is I know when
9 we moved from the old Power Plant to the new Power Plant, I
10 seen a lot of these things that I gave them for the idea,
11 they did put them into works at the new -- at the training
12 center.

13 Q. You don't know if other people had come up with
14 similar ideas over the years, do you?

15 A. I don't know, sir.

16 Q. And you don't know whose idea it was to set up the
17 training facility the way it was set up other than the fact
18 that you had some similar ideas, right?

19 A. Correct, sir.

20 Q. Okay. Let me ask you, you brought with you today
21 a whole large box of tapes, videotapes, right?

22 A. Yes, sir.

23 Q. Do you have any idea how many videotapes are in
24 there, roughly?

25 A. I've got them written down at the house, sir.

Page 251

1 Q. Can you give me a rough estimate on the number?

2 A. I don't know right off the top of my head, sir.

3 Q. Okay. These are tapes you've had in your

4 possession for a while?

5 A. Ever since I've been at the Power Plant, sir.

6 Q. Okay. So these are all tapes you've had before

7 you started this lawsuit, right?

8 A. Yes, sir.

9 Q. Have you reviewed these tapes at various times?

10 A. Yes, sir, I watch a couple of them every other

11 night, sir.

12 Q. Okay. Is there anything specific on any of the

13 tapes that you believe involves racially discriminatory

14 language or conduct?

15 A. I don't know, sir. There's a lot of stuff on them

16 tapes and it just call it right off.

17 Q. Do you remember anything right now based on your

18 review of those tapes of anything that you believe is

19 racially derogatory, any language or actions that are

20 racially derogatory on those tapes?

21 A. I'm pretty sure it is, sir.

22 Q. What would that be that you recall?

23 A. Well, you know, probably some of the training

24 sessions, maybe at the training center, the training

25 sessions or maybe a couple of guys getting hot in the ring.

1 You know, every now and then guys lose their cools, things
2 of that nature, sir.

3 Q. What do you think you remember about any of those
4 hot sessions that would be racially derogatory?

5 A. Other than guys losing their cool, that's about
6 all I can remember off the top of my head, sir. I'd have to
7 really review the tape to --

8 Q. So you think based on your recollection now of
9 reviewing the tapes, you think the only thing on there that
10 might be racially derogatory is wrestlers getting after each
11 other?

12 A. Not just so much wrestlers getting after each
13 other. New guys coming in. When I say trainees coming in,
14 I felt it was trainees' abuse, like I told you earlier, with
15 some of the discrimination, the fact a higher black guy come
16 in and get treated totally different from a white guy, and
17 the tapes will prove that.

18 Q. So you'd have to compare one training tape to
19 another training tape?

20 A. Each tape is different. I mean, every month
21 you've got different guys come in for training. I mean, you
22 come in, a guy, you know, rough you up or rough your
23 feathers up, you're not going to come back the next month.
24 You might think he might go a little further the next time,
25 so --

Page 253

1 Q. Do you remember answering some questions
2 regarding -- and I don't want to know what you spoke to your
3 lawyers about, but do you remember answering some questions
4 regarding discovery and things in this case?

5 A. I don't remember at this time, sir.

6 Q. Do you remember being asked about documents or
7 things that you had that might be relevant to your case to
8 provide those?

9 A. From my lawyer or from you, sir?

10 Q. Well, from anybody.

11 A. Yes, sir, I remember something to the fact of
12 discovery. I remember discovery about being told what it
13 was, sir, about discovery.

14 Q. Why is it that you're just providing these tapes
15 today?

16 A. Nobody was willing to sign for them, sir.

17 Q. Excuse me?

18 A. Somebody got to be willing to sign for them.
19 There's a lot of tapes there. That's my library. That's my
20 history.

21 Q. Okay. Did you ever try to provide them at any
22 time before today?

23 A. Provide them to who, sir?

24 Q. Anybody. Since you started this lawsuit, did you
25 ever try to provide those tapes to anybody?

1 A. You know, I turned several tapes in to my lawyers
2 and it's for them to review and see what, you know, might be
3 on, so forth. It's their job to make sure that I'm not
4 wasting your time and their time. That's a lot of tapes to
5 go through.

6 Q. But this is the first time you decided to bring in
7 all of the tapes that you had?

8 A. Well, I figured, you know, I mean, if you need to
9 know, I'd rather for you to know now than not know at all,
10 sir.

11 Q. And the only thing you can think of as we sit here
12 today, the only thing you can think of that might be
13 racially derogatory on those tapes is how different trainees
14 were treated when they first came in or when they trained at
15 the Power Plant?

16 A. No, sir, I won't say there's more than just racial
17 derogatory things on the tapes. Unfair treatment, unjust
18 treatment, discrimination, all that stuff is on the tapes.

19 Q. What is it that pops in your mind that makes you
20 think that --

21 A. Sir, like I say, I can't remember right now.
22 There's a lot of tapes, and right now, I mean, when I watch
23 a tape, I look at two or three things. I look at from a
24 wrestler perspective. I look at the wrestler and the holds
25 maneuver. I'm not looking to see who's calling who names or

Page 255

1 who's trying to kick somebody because they don't like them
2 or because they're getting a dollar more in their contract.

3 Q. But nothing sticks out in your mind that there's
4 something on any particular tape that's racially derogatory
5 or racially discriminatory?

6 A. Sir, I've got tapes in there from when Paul White
7 was here, The Giant. This is WWF. He was here to -- when
8 Goldberg first did his initial training, to tapes to where
9 instructors fell asleep in the ring.

10 I mean, you'd be surprised with the video camera
11 on, it picks up different things. So it depends on what you
12 want to see. I mean, you know, you've got time to watch
13 tapes, but like I say, everything is on tape. The eye in
14 the sky don't lie, like they say.

15 Q. Well, we're going to have to reserve the right on
16 the record to ask you more questions if we need to once
17 we've had a chance to look at any and all of these tapes
18 that we need to look at.

19 A. Yes, sir.

20 Q. Okay. Appreciate that. Were you aware of any WWF
21 wrestlers who had a history as Tough Man or Ultimate
22 Fighting Champions or that kind of thing?

23 A. Yes, sir.

24 Q. Who would that be?

25 A. Butter Bean.

1 Q. Okay. Anybody besides Butter Bean?

2 A. Yes, I want to say his name, Billy Gunn and Mark
3 Mero.

4 Q. Anybody else besides those guys?

5 A. The only three guys I can recall, sir.

6 MR. PONTZ: Okay. Go ahead and mark this as
7 Defendants' Exhibit 12.

8 (Marked Defendants' Exhibit No. 12.)

9 BY MR. PONTZ:

10 Q. Let me hand you what's been marked Defendants'
11 Exhibit 12. This is a charge of discrimination. Is that
12 your signature down at bottom left corner?

13 A. Yes, sir.

14 Q. And it's dated February 24th, 2000? Or 24 Feb,
15 '00, right under your signature?

16 A. Yeah, that's my signature, sir.

17 Q. And is that the date that it appears to be under
18 your signature, Feb -- 24 Feb '00?

19 A. Yes, sir.

20 Q. And this is a charge of discrimination you filed
21 against WCW?

22 A. Yes, sir.

23 Q. Okay. And you understood when you made this
24 charge you made it under oath?

25 A. Yes, sir, I did, sir.

Page 257

1 MR. PONTZ: And let me hand you another document.
2 This will be Defendants' Exhibit 13.

3 (Marked Defendants' Exhibit No. 13.)

4 BY MR. PONTZ:

5 Q. And this is an additional charge of discrimination
6 that indicates that you're adding Turner Sports to this
7 matter; is that correct?

8 A. Yes, sir.

9 Q. And that's your signature at the bottom?

10 A. Yes, sir, it is.

11 Q. You're not aware of ever having worked with anyone
12 who worked for Turner Sports, are you?

13 A. Yes, sir, I have.

14 Q. Who is that?

15 A. Rocky King, sir.

16 Q. Okay. Other than Mr. King, are you aware of
17 anyone else that you believe worked for Turner Sports?

18 A. All four instructors were the employees of Turner
19 Sports.

20 Q. Why do you say that?

21 A. Because they wore their "Turner" badges.

22 Q. Do you know who paid their salaries?

23 A. Not really, sir.

24 Q. Do you know who their employer was other than what
25 you saw on a badge?

1 A. Ted Turner, sir.

2 Q. That's your belief?

3 A. Yes, sir.

4 Q. Okay. But do you base that simply on the badge
5 that they wore?

6 A. Well, they walk around in open with a badge with
7 the pitch on it and say, you know, Turner Sports and, you
8 know, Turner, I would think it would be something out of
9 Turner, sir.

10 Q. When did they start wearing those badges?

11 A. I don't know, sir.

12 Q. Was that at the new Power Plant?

13 A. I can't recall, sir.

14 Q. Do you ever remember seeing those badges at the
15 old Power Plant on Log Cabin Drive?

16 A. I can't remember, sir.

17 Q. Okay. Did you ever work with anyone, to your
18 knowledge, who worked for Turner Broadcasting System?

19 A. Is that a different branch, sir, or --

20 Q. Do you know what Turner Broadcasting System even
21 is?

22 A. TBS, sir.

23 Q. Are you aware of anyone who worked with TBS that
24 you worked with?

25 A. That I worked with or that I worked for, sir?

Page 259

1 Q. Either one.

2 A. WCW, sir.

3 Q. What about WCW?

4 A. It's the same company. I mean, TBS and WCW is the
5 parent company is Turner, sir.

6 Q. Why do you say that?

7 A. Because WCW is just a branch off of Turner, sir.

8 Q. How do you know that?

9 A. Excuse me, sir?

10 Q. How do you know that?

11 A. Because it's a Turner based company. It's a
12 Turner owned company, sir.

13 Q. Okay. Do you understand the corporate structure
14 of how WCW relates to Turner Broadcasting System?

15 A. Yes, sir.

16 Q. What is that?

17 A. It's the parent company, sir.

18 Q. You believe Turner Broadcasting is a parent
19 company of WCW?

20 A. Turner is the big company. WCW is the branch off
21 of Turner, sir.

22 Q. Okay. Other than what you stated about the
23 relationship of these companies, do you believe you ever
24 worked with anyone who was employed by TBS who wasn't with
25 WCW?

1 A. Do I believe? I don't know, sir.

2 Q. Are you aware of anybody who worked for Turner
3 Sports or TBS, as you understood it, who wasn't a WCW
4 person?

5 A. I'm not sure, sir. It's confusing, but I'm not
6 sure on it.

7 Q. Okay. Do you have any evidence that WCW acted as
8 an agent of Turner Sports or Turner Broadcasting?

9 A. Do I have any -- excuse me?

10 Q. Do you have any evidence that WCW acted as an
11 agent of Turner Sports or Turner Broadcasting?

12 MR. ICHTER: Object to the extent that it calls
13 for a legal conclusion, but you can answer.

14 THE WITNESS: Okay.

15 MR. ICHTER: If you know what that means.

16 THE WITNESS: No, sir, I don't understand your
17 question.

18 BY MR. PONTZ:

19 Q. Okay. Do you know what it means to be someone's
20 agent?

21 A. Yes, sir.

22 Q. Okay. Do you have any evidence that WCW acted as
23 an agent for Turner Sports or Turner Broadcasting?

24 A. It would have to be if it's a part of the parent
25 company, sir.

Page 261

1 Q. So you believe all parts of the parent company act
2 as an agent for the parent company?

3 A. Well, at some time in point you've got to be
4 evaluated and got to give them what you call a test to make
5 sure that things are being run at the proper procedure, sir.

6 Q. What do you base that on, Mr. Norris?

7 A. The army, sir.

8 Q. That's the way things ran in the army?

9 A. No, not just the army. Just the way the
10 government run things, sir.

11 Q. Okay. This isn't government, right? This is a
12 private company?

13 A. Yes, sir. What I'm saying about companies, big
14 parent companies usually check on their little kids, pretty
15 much what I'm saying, sir. If Turner is the big company,
16 usually somebody has got to say, okay, then, let's go down
17 and see, make sure they're doing this right, and especially,
18 so to speak, sir, is what I'm --

19 Q. Do you know whether they actually did that or not?

20 A. I don't know, sir. I have no clue, sir.

21 Q. Do you know what it means to be someone's alter
22 ego?

23 A. No, sir, I don't.

24 Q. Okay. Do you know what a joint venturer is?

25 A. Joint venturer? I'm not sure, sir.

1 Q. What is your understanding of what a joint
2 venturer is?

3 A. I'm not sure, sir.

4 Q. You don't have any understanding of what it is?
5 What do you think it might be?

6 A. I'm not sure, sir.

7 Q. Okay. So if I asked you if you had any evidence
8 that WCW and Turner Sports were joint venturers, would you
9 understand that question?

10 A. If you use both of them in the same paragraph,
11 yes, I would, sir.

12 Q. What would you think it meant if I asked you
13 whether WCW and Turner Sports were joint venturers?

14 A. I'd put the two words together, "joint" and
15 "venturer" and I'd say they got something to do with each
16 other, sir.

17 Q. Okay. Is that your understanding of joint
18 venturer, they'd have something to do with each other?

19 A. Yes, sir.

20 Q. Can you name anyone who you interacted with other
21 than Mr. King and your statement about the trainers, can you
22 name anyone else who you interacted with that you believe
23 was employed with Turner Sports who wasn't a WCW person?

24 A. Sir, I really didn't really interact with Mr.
25 King. I just knew Mr. King through the wrestling circuit.

Page 263

1. Q. Okay.

2. A. And same thing with instructors, I just knew them
3 because they were instructors. I'm not really interact with
4 anybody as far as Turner Sports or WCW. I was there to
5 train and learn and try to become a professional wrestler.

6 Q. I understand, but you had interactions with WCW
7 people at the Power Plant, right? You'd talk to them and --

8 A. No, sir. I only wrestled with them and trained
9 with them. After I went home, I went home.

10 Q. Okay. Is there anybody else you had any contact
11 with who wasn't a WCW person who you believe was a Turner
12 Sports person?

13 A. No, sir.

14 Q. Is there anybody else who we haven't talked to
15 today that you believe you complained to or brought to their
16 attention your allegations of discriminatory conduct, or is
17 it just the people we talked about today?

18 A. I'm trying to understand the question. You said
19 that we talked to here, sir?

20 Q. No, no. You mentioned today some people who you
21 believe you talked to or you recall talking to about things
22 that you thought were discriminatory.

23 A. Yes, sir.

24 Q. And you mentioned Terry Taylor and JJ Dillon and
25 Eric Bischoff, you tried to talk to him and you mentioned

1 Jody Hamilton and the trainers.

2 Is there anybody else you can think of that you
3 believe you talked to to raise concerns about discrimination
4 or anything like that?

5 A. Other than the ones we talked about right now,
6 sir, I can't recall any others, sir.

7 Q. Okay. Other than your lawyers, is there anybody
8 you've spoken to about the claims involved in your
9 lawsuits -- in your lawsuit?

10 A. My spouse, sir.

11 Q. Other than your wife and your lawyers, have you
12 talked to anybody else about your claims?

13 A. My mother.

14 Q. Okay. Anybody outside your immediate family?

15 A. No, sir.

16 Q. What damages do you understand you're seeking to
17 try to recover in this lawsuit against WCW and Turner
18 Sports? What is it that you're looking for?

19 A. Well, sir, I could never go back and recuperate
20 the time that I lost, the things that me and my family have
21 forfeit, you know, things I put on hold for my family to
22 come down here. I probably never could recuperate, recover
23 them things as far as --

24 Q. Do you have some idea of -- I don't mean to
25 interrupt you, but do you have some idea of an amount of

Page 265

1 money that you believe that you were -- that you lost
2 because of that?

3 A. If I had to put a dollar sign on it, sir, the best
4 way I could do it is I would have to actually put myself
5 among guys who I think my caliber wrestler in the WCW, or
6 like we said earlier, my namesake or my credentials.

7 Q. Okay.

8 A. And I'd have to match it with that, because I
9 really don't know the market as far as wrestling, as far as
10 the dollar amount who makes what or who make the decision on
11 what.

12 Q. Who would be the guys that you would compare
13 yourself to as far as dollar amount?

14 A. Tank Abbott. Why not? I'm better than he is.

15 Q. Anybody else besides Mr. Abbott?

16 A. Well, let me see who all actually legitimate shoot
17 fighter in WCW. You have guys like Kevin Nash used to be a
18 bouncer. I used to be a bouncer.

19 Power lifter. Who used to be a power -- Scott
20 Steiner used to be a power lifter. I used to be a power
21 lifter. Lex Luger used to be a body builder. I used to be
22 a body builder.

23 You notice all these things that one guy used to
24 be, I did like ten of these things. I've got probably --
25 maybe probably eight to ten different events that I went

1 through high school and other things that I majored over 207
2 some trophies in.

3 Q. So you think you should have been paid similar to
4 Tank Abbott or Kevin Nash or Scott Steiner or Lex Luger?

5 A. Talent-wise.

6 Q. Well, there's more than -- we already talked about
7 there's certainly more than just being a power lifter or
8 being a shoot fighter to be being a successful --

9 A. You're correct.

10 Q. -- wrestler, right?

11 A. What's more remarkable, you take one power lifter
12 or you can take one guy who can do ten things?

13 Q. But you agree with me that each of those people
14 brought more than just that skill to them to the ring,
15 right?

16 A. Each one of the people had opportunity to bring it
17 to the ring and show what they had. I never had the
18 opportunity and the thing to showcase, and the only way I
19 had afforded an opportunity to showcase is what I'm doing
20 now currently with Tough Man.

21 Q. And you believe that if you'd been given that
22 opportunity, you would have been as successful as those
23 people?

24 A. Numbers speak for itself. I'm the Tough Man
25 champion right now, reigning champion right now.

Page 267

1 Q. Do you have videos of your Tough Man
2 championships?

3 A. I sure do.

4 Q. Are they in that box?

5 A. No, they're not. I have them, though.

6 Q. How many do you have?

7 A. Quite a few. I've got some in the box, yes, sir,
8 I do have some in that box.

9 Q. How many do you think you have that aren't in that
10 box?

11 A. I don't know, sir.

12 Q. And are these videos of actual Tough Man episodes?

13 A. Fights, yes, sir.

14 Q. Are they championships as well as non-championship
15 fights?

16 A. Yes, sir, championship fights.

17 Q. If we ask you, will you provide a copy of those to
18 your attorney, would you be willing to do that?

19 MR. ICHTER: Well, wait a minute. Usually there's
20 a pay-per-view charge associated with that, so --

21 BY MR. PONTZ:

22 Q. Are these things you taped off of --

23 A. Yes, sir.

24 Q. -- cable TV or pay-per-view?

25 A. Well, both. They had some on pay-per-view and

1 some on cable television.

2 MR. ICHTER: We'll get you a copy, Evan. I'm just
3 pulling your leg.

4 MR. PONTZ: I appreciate that.

5 BY MR. PONTZ:

6 Q. We'd appreciate it if you'd provide it to your
7 attorney, copies of those tapes or just the tapes for him to
8 make copies.

9 A. It really doesn't show how good I really am.

10 Q. That's fine. In the sport of the fighting?

11 A. No, not just the sport of fighting. Tough Man is
12 just like wrestling in a way, but it's real. The difference
13 is they still look at somebody charismatic, somebody can
14 draw and put behinds in seats, and somebody that fans will
15 pay 20, 30, 40, \$50 to sit ringside and cheer at or boo at.

16 Q. But you've got to win or be --

17 A. Excuse me?

18 Q. You've got to be a credible fighter, right?

19 A. I'm a credible fighter. I'm the champion. I had
20 to be credible. I'm the champion. I'm not champion because
21 they said, okay, we want you to have the belt, Hardbody.

22 Q. You don't have to be a credible fighter to be a
23 wrestler, though, right?

24 A. No, you don't.

25 Q. Can you provide me any other specific damages that

Page 269

1 you think you've suffered because of the discrimination in
2 this case?

3 A. Yes, I mean, I can get you a list of things that,
4 like bills and stuff that got behind on that I had to play
5 catch up. I definitely, you know, go to all my bills and
6 say, hey, I need that when I was behind, you're talking
7 about cutting this off or cutting that off or you did cut
8 this off or you did want to repossess this or you did want
9 to take this from because of income.

10 Q. Why do you believe that was discrimination by WCW
11 that caused you to get behind on your bills?

12 A. Well, think about it, I got released in October.
13 Two months before Christmas. I have family, too.

14 Q. Right. What efforts did you make to find a job
15 after you got released from WCW?

16 A. The next day I went out and, like I say, I turned
17 up the volume on my Tough Man. I turned up the volume on my
18 wrestling.

19 Q. Did you make more money in 2000 with your Tough
20 Man than you had in the previous year of wrestling?

21 A. In 2000, is it 2000 or 2001, yes, I did.

22 Q. Not the year before?

23 A. I'm not sure what year. I mean, I get confused.

24 Q. What other efforts did you make to earn money
25 after you were let go from WCW?

1 A. That's what I did, the Tough Man, did my
2 wrestling, my boxing. That was it, sir.

3 Q. Okay. Did you ever go out to look for a regular
4 9:00 to 5:00 job?

5 A. No, I didn't, sir.

6 Q. Any reason you couldn't have done that?

7 A. Excuse me, sir?

8 Q. Any reason you could not have done that?

9 A. Yes, sir.

10 Q. Why couldn't you have done that?

11 A. Because Tough Man had me on a schedule.

12 Q. They had a set schedule for you?

13 A. Yes, sir.

14 Q. What was that?

15 A. Well, they had me doing appearances and they were
16 paying me to show up to appearances, just like WCW, and then
17 I was scheduled to do so many fights a year.

18 Q. Okay. And there was no time in between
19 those events --

20 A. I had to train. If you want to be the best, you
21 have to train like the best.

22 Q. So you made the decision to focus on the Tough Man
23 stuff --

24 A. I made more money. I tripled -- I almost tripled
25 what I made practically, you know.

Page 271

1 Q. And you believe your tax returns will show what
2 you made in Tough Man competitions in 2000, 2001?

3 A. Sure.

4 Q. Okay. Other than the damages you talked about
5 about the time that you were training at WCW and the time
6 lost and what you just talked about about getting behind in
7 bills, not earning money after you were let go from WCW, are
8 there any other damages you can think of you believe you
9 suffered because of the discrimination by WCW?

10 A. Yes. I mean, I lost vehicles and stuff like that.
11 I mean, I blew up one engine, you know, in a van because I
12 put the miles on it driving from show to show. I mean, the
13 shows that were surrounding.

14 Q. Why do you believe that that was because of
15 discrimination?

16 A. Well, it's not a case why I believe it's
17 discrimination is. I had to be at the event, okay. If they
18 said they ain't going to fly me there, if I've got to drive,
19 then I've got to drive.

20 Q. And there were other white wrestlers who had to
21 drive places, didn't they?

22 A. Most the time them guys doubled up and rode with
23 each other if they did have to drive, but you didn't hear
24 about it and --

25 Q. I'm sorry. Go ahead.

1 A. I mean, I got time to go somewhere and everything,
2 you're going to ask for a ride, but you get left.

3 Q. Who did you ask for a ride?

4 A. Well, just some of the white wrestlers.

5 Q. And they said no?

6 A. They wouldn't wait at all, yes.

7 Q. Did you ask any of the wrestlers to ride with you,
8 chip in for expenses and things like that?

9 A. I sure did.

10 Q. Did they say yes?

11 A. Well, I wasn't a name guy, so I didn't -- I was a
12 nobody, remember, so they didn't want to ride with me. They
13 only want to ride with the name guys.

14 Q. How about any of the other African-American talent
15 that was going to matches with WCW?

16 A. Most of the time, 90 percent of the time we all
17 weren't booked at the same time, and they might use me this
18 week and next week not use me for the next four weeks, use a
19 different black guy, you know.

20 I mean, we all watch the show on Nitro, sir. The
21 show wasn't fulfilled with a lot of blacks, you know. Very
22 sparingly. You might have one on the card that night, maybe
23 two.

24 Q. Any other things you believe you suffered as
25 damages because of discrimination by WCW?

Page 273

1 A. Well, my emotional state. I mean, my emotional
2 state was because I came down here, me knowing what I know
3 and who I am, with thinking this good praise about the
4 company WCW, and then when I get inside of it, it's totally
5 shock.

6 Q. Okay. Did you ever see any psychiatrist or
7 psychologist about the emotional stress you were under?

8 A. No, I didn't, sir.

9 Q. A counselor or anybody like that?

10 A. No. The only thing I did, I prayed and talked to
11 my mom about it. She supported me through the whole thing.

12 Q. Okay. And you'd agree with me that once -- are
13 you aware that WCW shut down in March of 2001?

14 A. I know they shut down. I wasn't aware of the
15 date, sir. I stopped watching it. After I was released, I
16 stopped watching it, sir.

17 Q. Well, assuming with me, and if I'm wrong, I'm
18 wrong, but assuming with me that WCW shut down in March of
19 2001, you'd agree with me that after WCW shut down, had you
20 still been with them, you would have had to go find other
21 opportunities to make money, right?

22 A. Yes, sir.

23 Q. So whatever you were receiving from WCW would have
24 ended when WCW shut down, as far as you know, right?

25 MR. ICHTER: I'm going to object to that to the

1 extent that it calls for facts not in evidence, and is, as a
2 matter of fact, contrary to the facts.

3 BY MR. PONTZ:

4 Q. Okay. Mr. Norris, what's your understanding? You
5 think you would have still gotten paid from WCW after it
6 shut down?

7 A. No, sir, I won't think I still got paid, but I
8 think if I were given a fair opportunity to excel myself, I
9 could have very easily gotten into WWF or very easily got,
10 you know, triple time for in Tough Man with a good positive
11 push with the WCW market.

12 Q. And I take it that the only efforts you've made to
13 earn money since you left WCW was what you talked about with
14 the Tough Man, and what efforts did you make? You mentioned
15 wrestling, too. What efforts have you made to earn money
16 through wrestling since you left WCW?

17 A. Well, I run my own wrestling shows also, sir.

18 Q. This is SCWA or --

19 A. Yes, sir.

20 Q. Okay. How many shows have you run since you left
21 WCW?

22 A. I can't count on my hand. I've got them on tapes.
23 I have most of them on tapes, sir.

24 Q. How often are these shows?

25 A. Well, practically we run a couple a month, at

Page 275

1. least two to three a month, sir.

2 Q. Okay. And how much were you earning doing that?

3 A. It varies. I mean, it all depends on the crowd.

4 If you catch people at the right time, you know, you might

5 get a hundred people, maybe 200 people. It wasn't no 30,

6 40,000.

7 Q. If you got 200 people to show, let's say, how much

8 roughly do you think you'd make from that kind of show?

9 A. It all depends, sir, because you still had to pay

10 your talent on the car, your referees, you've got to pay

11 your security. I mean, you know.

12 Q. Were you making a few hundred dollars per each

13 show?

14 A. Yeah, a couple hundred dollars.

15 Q. Did you ever make a few thousand dollars per each

16 show?

17 A. I think a couple times maybe a couple thousand,

18 but once again, that was a prepaid show or something like

19 that.

20 Q. Who were you running SCWA with? Who were the

21 other people involved in running that?

22 A. I was the owner of it. Dory Bravard.

23 Q. Dory Bravard?

24 A. Right.

25 Q. Who else besides --

1 A. Well, like I say, I was the owner. She was the
2 president and then usually what we did is just bring
3 different guys in to wrestle and we rotated the guys.

4 Q. Where did you find wrestling talent for SCWA?

5 A. They call us up, guys that wanted to wrestle off
6 the independent circuit, guys at the Power Plant that never
7 did matches. They were, hey, Hardbody, you got a show going
8 on, can I go on a car. If I get three or four belts and
9 some on tape, they'll use me.

10 Q. And you have copies of these shows on tape?

11 A. Yes, sir.

12 Q. Have you provided them in that box?

13 A. Yes, sir.

14 Q. All of them?

15 A. (Indicated in the affirmative.)

16 Q. And you wrestle in those shows?

17 A. Yes, sir.

18 Q. Did you get paid as a wrestler as well as the
19 owner of this company?

20 A. I never paid myself as the owner. Only paid
21 myself as a wrestler, sir.

22 Q. How much do you pay yourself as a wrestler in
23 these shows?

24 A. Most the time anywhere between 25, 50 bucks.

25 Q. Less than you were making in WCW appearances?

Page 277

1 A. Excuse me, sir?

2 Q. Less than you were making for your WCW
3 appearances?

4 A. Yes, sir.

5 Q. And you haven't seen any doctors or anything due
6 to anything that happened at WCW, other than some injuries
7 during the course of things, you haven't seen a psychiatrist
8 or a psychologist or anything like that?

9 A. No, sir.

10 Q. Have you seen any doctor for any physical injury
11 that happened at WCW since you left WCW?

12 A. Only once, sir.

13 Q. What was that?

14 A. When the -- I can't remember the guy that sued me
15 and WCW. Remember, when I broke his nose type deal, he cut
16 my finger open. I got -- I went in and got another AIDS
17 test -- I do that every six months -- because his teeth had
18 cut this thing open, you know, and they didn't sew it up,
19 but I get a check every six months, you know, usually.

20 Q. Okay. But other than that, no other medical
21 expenses that you can think of?

22 A. Yes, the one down in Florida in Orlando, the deal
23 with me and Mr. Wright.

24 Q. The stitches that you got?

25 A. They're still billing me for that thing. They're

1 still billing me for that thing.

2 Q. How much are they billing you?

3 A. Oh, sir, I don't know. It's probably between 253,
4 or \$353, sir. They're still billing me. Why, I don't know.

5 Q. Any other medical expenses that you can think of?

6 A. That's it, sir.

7 Q. Do you know what kind of arrangement you have with
8 your attorneys as far as how you're paying for the
9 representation of you in this lawsuit?

10 A. Excuse me, sir?

11 Q. Do you understand how you're paying your attorneys
12 for representing you in this lawsuit?

13 A. I pay like everybody else, sir. If I don't, he
14 don't represent me, sir.

15 Q. Have you paid some money already to the law firm
16 to represent you?

17 A. Yes, I've got to, sir.

18 Q. How much have you paid; do you know?

19 A. I'd rather not say, sir.

20 Q. Excuse me?

21 A. I'd rather not say, sir.

22 Q. I know, but I need to ask you. I need to know.

23 MR. ICHTER: You can tell him.

24 THE WITNESS: I don't have a record of it. I
25 would have to have him pull the records on it.

Page 279

1

2 BY MR. PONTZ:

3 Q. You have records at home of how much you paid?

4 A. No, I don't, sir.

5 Q. You don't have any records at all?

6 A. No.

7 Q. Can you give me an estimate of what you think you
8 paid?

9 A. I don't know right off the top of my head, sir.

10 Q. More than \$5,000?

11 A. I don't know, sir.

12 Q. You don't have any idea?

13 A. (Indicated in the negative.)

14 Q. Did you pay the lawyers money to start the lawsuit
15 for you?

16 A. Yes, sir.

17 Q. Do you remember how much you paid them up front to
18 start?

19 A. (Indicated in the negative.)

20 Q. You don't have any --

21 A. No, sir.

22 Q. -- recollection at all?

23 A. No, sir.

24 Q. Okay. Do you have an agreement with them to share
25 in the percentage if you recover any money in the lawsuit?

1 Is that your understanding?

2 A. Explain? Sorry, sir.

3 Q. Are you paying them for every hour that they
4 represent you?

5 A. My bills, though, when I get them in the mail,
6 hey. Yes, sir.

7 Q. You're paying them by the hour?

8 A. I'm paying them hour also, sir. Hour and job as
9 well, sir.

10 Q. Okay. Are you paying them -- do you understand
11 that you have an agreement with them to pay them some
12 percentage of anything you recover with WCW --

13 A. Yes, sir.

14 Q. -- in your lawsuit?

15 A. I understand that, sir.

16 Q. Do you know what that percentage is?

17 A. I'm not sure, sir.

18 Q. You don't -- do you remember signing a written
19 agreement?

20 A. Yes, I did, sir.

21 Q. And that laid out the percentage?

22 A. I'm pretty sure it did, sir, yes, sir.

23 Q. Okay. So you think you're paying some money up
24 front and some money during the representation and then also
25 a percentage of any recovery; is that your understanding of

Page 281

1 the relationship?

2 A. Yes, sir.

3 Q. Mr. Norris, what did you do to prepare for the
4 deposition today?

5 A. Actually, stayed up all night, you know, just
6 worked, you know, work on my wrestling, my boxing, looked at
7 a couple tapes trying to see what would be, you know, been a
8 factor, but then again, I love watching the matches, so I
9 get into the matches more than so looking for the other
10 stuff.

11 Q. Do you remember which of the tapes you looked at
12 in particular?

13 A. Tough Man. I looked at a couple Tough Man tape.
14 I looked at a couple of matches that I wrestled with
15 Glacier, what is his name? -- Disco Inferno, Prince Iaekea,
16 a couple of matches like that.

17 Q. And you don't remember from watching last night
18 anything that stood out to you or stuck out in your mind as
19 discrimination?

20 A. No, sir.

21 Q. Okay. Other than looking at the tapes last night
22 and other than talking to your lawyers, did you talk to
23 anybody else to prepare for the deposition today?

24 A. My mother.

25 Q. Anybody besides your mom?

1 A. My wife.

2 Q. Did you look over any documents or notes to
3 prepare for the deposition today?

4 A. Only notes I got is just my notes. I mean, notes
5 that I, you know, from the time I came to the Power Plant
6 until like up until the time frame now, sir.

7 Q. Are those notes you produced to your attorney?

8 A. Yes.

9 MR. PONTZ: Cary, we haven't seen any notes in
10 anything produced to us.

11 MR. ICHTER: Okay. I'll look into it.

12 MR. PONTZ: If you'll find out about Mr. Norris'
13 notes.

14 MR. ICHTER: Sure.

15 MR. PONTZ: Obviously if there's some privilege
16 issues we can discuss that, but if there were notes that he
17 was taking while he was out at the Power Plant before the
18 lawsuit started, obviously we'd like to see those.

19 MR. ICHTER: Right.

20 BY MR. PONTZ:

21 Q. You provided, you believe, all your notes to your
22 attorneys?

23 A. Yes.

24 Q. Did you look at them last night?

25 A. Mostly to, you know, most of it is stuff I

Page 283

1 scribble down, like, say, for instance, if I wrestle a guy
2 on the 17th of March, I know who I wrestled and where we
3 wrestled at and things of that nature. It wasn't nothing
4 fancy or nothing like that.

5 Q. Were any of these notes things that were prepared
6 at the instruction of your attorneys?

7 A. No, sir.

8 Q. Okay. If you'll make sure you provided those to
9 your attorneys, that would be great.

10 A. Yes, sir.

11 Q. Did you keep a journal or a diary or anything like
12 that while you were at WCW?

13 A. Right there, sir.

14 Q. The videotapes?

15 A. Yes, sir.

16 Q. Anything besides the videotapes?

17 A. No, sir.

18 Q. Did you keep a daily planner or a calendar or
19 anything like that?

20 A. No, sir.

21 Q. Any other notes or documents you believe you have
22 from WCW?

23 A. No, sir.

24 MR. PONTZ: Well, subject to the areas that we
25 might have to go into based on the tapes and other

1 documents, I think we're done.

2 MR. ICHTER: Okay.

3 THE WITNESS: Okay.

4 MR. ICHTER: I have no questions.

5 (Deposition concluded at 3:54 p.m.)

6

7

8


HARRISON NORRIS, JR., Dependent

9

10 Sworn to and subscribed before me this 3rd day of

11 June, 2002; Fulton County,

12 Georgia. Deborah Landers Notary Public)

13 My Commission Expires: Notary Public, Cobb County, Georgia.
My Commission Expires March 27 2003.

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Page 285

1. C E R T I F I C A T E

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3.

4. STATE OF GEORGIA:

5. FULTON COUNTY:

6. I hereby certify that the foregoing transcript
7. was taken down, as stated in the caption, and the question
8. and answers thereto were reduced to typewriting under my
9. direction; that the foregoing pages represent a true and
10. correct transcription of the evidence given upon said
11. hearing, and I further certify that I am not of kin or
12. counsel to the parties in the case; am not in the regular
13. employ of counsel for any of said parties; nor am I in any
14. way interested in the result of said case.

15. This, the 11th day of March, 2002.

16.

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Kristine A. Bokelmann, CCR B-2148

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25.

1 documents, I think we're done.

2 MR. ICHTER: Okay.

3 THE WITNESS: Okay.

4 MR. ICHTER: I have no questions.

5 (Deposition concluded at 3:54 p.m.)

6

7

8

HARRISON NORRIS, JR., Deponent

9

10 Sworn to and subscribed before me this ____ day of

11 _____, 2002; _____ County,

12 Georgia. _____ Notary Public)

13 My Commission Expires: _____

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Page 285

C E R T I F I C A T E

-oOo-

STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the question and answers thereto were reduced to typewriting under my direction; that the foregoing pages represent a true and correct transcription of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This, the 11th day of March, 2002.


Kristine A. Bokelmann, CCR B-2148